



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUN 27 2012

REPLY TO THE ATTENTION OF:  
LR-8J

**CERTIFIED MAIL 7009 1680 0000 7644 9328**  
**RETURN RECEIPT REQUESTED**

Mr. William E. Murphie  
Manager  
Portsmouth/Paducah Project Office  
U.S. Department of Energy  
1017 Majestic Drive, Suite 200  
Lexington, Kentucky 40513

Mr. Woodrow B. Jameson  
Fluor-B&W Portsmouth, LLC  
Post Office Box 548  
Piketon, Ohio 45661

Re: Notice of Violation  
RCRA Compliance Inspection  
U.S. DOE Portsmouth Gaseous Diffusion Plant, Piketon, Ohio  
OH7 890 008 983

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Dear Messrs. Murphie and Jameson:

On June 27, 2011 representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (Ohio EPA) inspected the U.S. DOE Portsmouth Gaseous Diffusion Plant (U.S. DOE-Portsmouth) installation located at 3930 US Route 23 South, Piketon, Ohio. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based upon information provided by U.S. Department of Energy (DOE), Fluor-B&W Portsmouth, LLC (FBP), and Wastren-EnergX Mission Support, LLC (WEMS) personnel, review of records, and physical observations by the inspectors, EPA has determined that DOE and FBP violated certain requirements of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR). We find that DOE and FBP were in noncompliance with the following requirements:

- 1) Except as provided in paragraphs (A)(1) to (A)(4) of OAC Rules 3745-279-20 to 3745-279-24 of the OAC apply to all used oil generators. See, OAC Rule 3745-

279-20(A). Used oil generators are subject to all applicable spill prevention, control and countermeasures (40 CFR Part 112) in addition to the requirements of Rules 3745-279-20 to 3745-279-24 of the OAC. See, OAC Rule 3745-279-22. Specifically, containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." See, OAC Rule 3745-279-22(C) [40 CFR § 279.22].

During the inspection of Building X-326, the inspectors observed six pails of used oil that were not labeled "Used Oil." At the time of the inspection, U.S. DOE-Portsmouth was in violation of OAC Rule 3745-279-22(C) [40 CFR § 279.22(c)(1)]. On June 30, 2011, Mr. Daniel Mains sent EPA and Ohio EPA photographs of the appropriately labeled pails. Based on this information, DOE and FBP have resolved the violation of OAC Rule 3745-279-22(C) [40 CFR § 279.22(c)(1)].

- 2) A small quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment. Specifically, a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. See, OAC Rule 3745-273-13(D)(1) [40 CFR § 273.13(d)(1)]. In addition, each lamp or container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." See, OAC Rule 3745-273-14(E) [40 CFR § 273.14(e)].

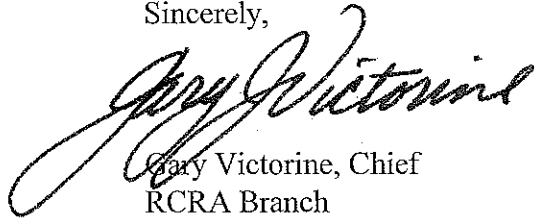
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During the inspection of the Electrical Shop in Building X-330, the inspectors observed uncontainerized used fluorescent lamps and three boxes of unlabeled used fluorescent lamps. DOE - Portsmouth was in violation of OAC Rule 3745-273-13(D)(1) [40 CFR § 273.13(d)(1)] and OAC Rule 3745-273-14(E) [40 CFR § 273.14(e)]. On June 29, 2011 Ms. Rosemary Richmond sent an e-mail to EPA and Ohio EPA of the containerized and labeled used fluorescent lamps. Based on this information, DOE and FBP have resolved the violations of OAC Rule 3745-273-13(D)(1) [40 CFR § 273.13(d)(1)] and OAC Rule 3745-273-14(E) [40 CFR § 273.14(e)].

This letter is to inform you that EPA has reviewed the referenced information, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Ohio EPA will continue to evaluate DOE and FBP in the future.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,

A handwritten signature in cursive script, reading "Gary Victorine". The signature is written in dark ink and is positioned above the printed name and title.

Gary Victorine, Chief  
RCRA Branch

Enclosure

cc: Melody Stewart, OEPA – Southeast District Office

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bcc: Tim Thurlow, C-14J

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U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: PORTSMOUTH GASEOUS DIFFUSION PLANT

FACILITY U.S. EPA ID NO.: OH7 890 008 983

FACILITY TYPE: Large Quantity Generator/Container Storage Facility

FACILITY ADDRESS: 3930 US Route 23 South  
Piketon, Ohio 45661

U.S. EPA REPRESENTATIVE: Walt Francis

DATE(S) OF INSPECTION: June 27, 2011

SIC CODE: 2819 - Industrial Inorganic Chemicals, Not Elsewhere  
Classified

NAICS CODE: 325188 - All Other Basic Inorganic Chemical  
Manufacturing

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PREPARED BY: Walt Francis  
Walt Francis  
Environmental Scientist

7/18/2011  
Date

ACCEPTED BY: Paul Little  
Paul Little, Chief  
Compliance Section 2  
RCRA Branch

7/19/11  
Date

**Purpose of Inspection**

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the U.S. Department of Energy Portsmouth Gaseous Diffusion Plant (Portsmouth), Piketon, Ohio to determine its compliance with the Resource Conservation and Recovery Act (RCRA), the Ohio Administrative Code (OAC), and the RCRA Permit requirements with respect to U.S. DOE's management of hazardous waste, universal waste and used oil.

**Participants**

U.S. Environmental Protection Agency (U.S. EPA) Inspector -  
Walt Francis, Environmental Scientist

Ohio Environmental Protection Agency (Ohio EPA) Inspector -  
Melody Stewart, Hazardous Waste Inspector

Representatives of U.S. DOE, Fluor-B&W Portsmouth, LLC (FBP), Wastren-EnergX Mission Support, LLC (WEMS) and Restoration Services (RSI)-

Kristi Wiehle, U.S. DOE  
Rosemary Richmond, FBP  
Chris Guilliams, FBP  
Robert Anderson, WEMS  
Mitch Newman, FBP  
Amy Lawson, RSI  
Jim Thomson, FBP  
Frank Johnstou, FBP  
Dale Jackson, RSI  
Bridget Eslinger, FBP  
Jesse Pack, Insolves  
Daniel Mains, FBP  
Rob Lyon, FBP  
James Fontaine, FBP

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**Site Description/Background Information**

Historically, the main function of the Portsmouth facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF6) feedstock which contains 0.711% U235. The Plant had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as the permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage facilities. Waste generated by U.S. DOE and FBP from the environmental restoration is also stored in these facilities. USEC also generates non mixed radioactive hazardous waste which is shipped out of Building XT-847. USEC ceased the enrichment process in May 2001.

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and U.S. DOE are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of treatment, storage and disposal (TSD) facilities in the United States which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas. U.S. DOE sends some waste off-site (to U.S. DOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to U.S. DOE - Portsmouth for storage in the interim prior to their final disposal.

U.S. DOE/FBP generated hazardous wastes are primarily shipped to Energy Solutions, Clive, Utah, Perma-Fix, Gainesville, Florida, and Diversified Scientific Services, Inc. (DSSI), Kingston, Tennessee. In addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes. Uranium Disposition Services is working on a project to recover material from depleted uranium hexafluoride cylinders.

U.S. DOE has received \$119 million dollars from the American Recovery and Reinvestment Act of 2009 for several projects including: decontamination and decommissioning (D&D) of the X-633 Recirculating Cooling Water Tower Complex; D&D of the X-760 Chemical Engineering Building; X-701B Groundwater Plume Removal; Repackaging and Disposition of Excess Uranium Materials; and D&D of the X-533 Switchyard Complex.

On March 25, 2011, Ohio EPA renewed the RCRA Permit for U.S. DOE. The renewed RCRA Permit includes six container storage areas in Building X-326.

### Opening Conference

On June 27, 2011, Walt Francis and Melody Stewart arrived at Building X-1000 at approximately 8:00 a.m. and informed the U.S. DOE and FBP representatives of the nature, scope, and procedures for the RCRA inspection. The inspection was conducted by U.S. EPA and Ohio EPA personnel as a Federal lead inspection. The facility representatives provided the team with a brief update of the facility since the last inspection, and a list of current hazardous waste satellite accumulation area (SAA) containers, hazardous waste less than 90 day accumulation areas, and universal waste accumulation areas. Ms. Rosemary Richmond allowed the inspectors access to the facility to conduct the inspection.

### Site Tour

The walk-through began in Building X-326. Mr. Guilliams showed the inspectors a Universal Waste accumulation container in the Control Room (ACR 5). The inspectors observed a blue container utilized for small incandescent bulbs. The inspection continued to container storage Area Number 3. The inspectors observed approximately thirty hazardous waste totes from Building X-700 labeled "D002/D007/D008/D010". Inspector Francis noted an accumulation date of "2/23/2010" on one of the totes. The inspection continued to Areas Number 5 in Building X-326. Inspector Francis observed a 55-gallon container labeled "Incinerator Ash, D005/D006" with an accumulation date of "9/18/95". The inspection continued to Area Number 2. The inspectors observed containers of hazardous waste and containers labeled "UF4 Waste". The inspection continued to Column T-69. The inspectors observed two 55-gallon containers labeled "Used Oil". The inspection continued to Area Number 4. The inspectors observed several containers labeled hazardous waste "Personal Protective Equipment (PPE)". The inspection continued to the Building X-326 L-Cage permitted storage area. The inspectors toured the L-Cage area. The inspectors noted several "RFD" container numbers so the waste profiles could be pulled by FBP personnel. Inspector Francis noted RFD number 56666-1 (X-710 TCLP Filters 1/11/2006) and RFD number 62047 "D007 - 9/23/09". The inspection continued to the South Drain Oil Tank in Building X-326, at Column L-88. The inspectors were introduced to Mr. Jack Tully, Building X-326 Building Superintendent. Mr. Tully explained how the pails of used oil are accumulated and placed in a 55-gallon used oil container. The inspectors noted that the small metal pails were not labeled "Used Oil". Inspector Stewart asked Mr. Tully about a drain in this area. Mr. Tully told the inspectors that it has a sump pump with a level and a sprinkler alarm which ultimately discharges to the storm sewer. The inspection continued in Building X-326 to Area Number 1 and a less than 90 day hazardous waste accumulation area. The inspectors observed approximately 15 "Poly" bottles labeled hazardous waste "Top Purge" with an accumulation date of 5/1/2011. The inspection continued to a less than 90-day accumulation area at Column C-48. The inspectors observed a 55-gallon container of hazardous waste with a "6/15/2011" accumulation date. The inspection continued to an SAA container DMSA #3 at Column F32. The inspectors observed a 55-gallon container of drip leg liquid (D008) and PCBs in this area with an accumulation date of "1/22/2009".



The inspection continued to Building X-330. Mr. Guilliams showed the inspectors SAA container DMSA #7 at column L71. The inspectors observed a 55-gallon hazardous waste container labeled "PCB Drip Leg, D008". The inspection continued to a less than 90 day accumulation area at column L49. The inspectors observed a container labeled "Aerosol Cans" with a "6/10/2011" accumulation date. The inspection continued to column L-50. The inspectors observed several polybottles stacked over a metal pan. The metal pan appeared to have an accumulation of used oil. The inspection continued to an Electrical Shop in Building X-330, at column F-49. The inspectors observed several uncontainerized used fluorescent lamps on a shop work bench and three cardboard boxes of used fluorescent lamps that were unlabeled, undated, and open. The inspection continued to a tank labeled "Lube/Drain Tank X-29-2". The inspectors observed several unlabeled metal buckets of used oil. The inspection continued to a Universal Waste Accumulation Area at column W35 in Building X-330. The inspectors observed cardboard boxes of used fluorescent lamps. Inspector Francis noted several accumulation dates including "2/1/2011", "4/25/2011", and "6/23/2011". Mr. Guilliams told the inspectors that the Universal Waste Accumulation Area at column W35 serves as a staging area for all universal waste used lamps from the process buildings. The inspection continued to Building X-333. Inspector Francis noted a container labeled "Lube Oil" at column C-42. The inspection continued to an SAA container DMSA#13 at column Ux48. The inspectors observed a 55-gallon container labeled "Drip Leg PCBs D008" with an accumulation date of "3/16/2011". The inspection continued to Building X-533. The inspectors met Mr. John Howard. Mr. Howard showed the inspectors the scrap metal operations. The inspection continued to Building X-630. The inspectors observed a less than 90 day hazardous waste accumulation area with a 55-gallon container of D008 hazardous waste with a "6/23/2011" accumulation date. The inspection continued to Building X-700 where the inspectors met Mr. Bob Anderson. Mr. Anderson showed the inspectors an SAA container for used solvent rags, an SAA container for used aerosol cans, a container labeled "Used Oil", a container labeled "Used Antifreeze", a 5-gallon container of used paint thinner/paint, and several containers of used fluorescent lamps. Inspector Francis noted that the accumulation dates were "5/17/2011", "5/18/2011", and "4/26/2011". The inspection continued to Building X-720. Mr. Anderson showed the inspectors a cardboard box and a plywood box for accumulating used fluorescent lamps. Inspector Francis noted the accumulation dates as "5/9/2011" and "4/26/2011". The inspection continued to Building X-701. The inspectors observed a SAA container labeled "Filters/PPE".

The inspection continued to Building X-623 where the inspectors met Mr. Greg Thompson. The inspectors observed four 750 gallon tanks labeled hazardous waste F001 and radioactive waste with a "6/10/2011" accumulation date, and three 55-gallon containers labeled "F001" with accumulation dates of "4/9/2011", "5/5/2011", and "5/20/2011". The inspectors also reviewed the weekly inspection logs for Building X-623. The inspection continued to Building X-624 where Mr. Greg Thompson showed the inspectors a 55-gallon SAA container. Inspector Francis observed a 55-gallon container that was labeled "Waste Bag Filters F001". The inspection continued to Building X-344B. The inspectors observed two 55-gallon containers of broken used fluorescent lamps dated "6/27/2011", a container labeled "Universal Waste" dated "6/1/2011", four 55-gallon containers labeled "Paint Hardener" (RFD Number 11-002194) and two unlabeled

55-gallon containers, and a one gallon rusty paint can (RFD Number 11-002197, "5/3/2011").

The inspection continued to Building X-533. The inspectors met Mr. Keith Bodenbender. Mr. Bodenbender explained the current demolition activities in the Switchyard. The inspection continued to Building X-747H. Mr. Guilliams showed the inspectors a less than 90 day accumulation area and a universal waste accumulation area. The inspectors observed a universal waste container of sodium lamps, sixteen lead acid batteries, a container of broken used fluorescent lamps (dated "4/2/2011"), and a 30-gallon container of empty aerosol cans.

The inspectors then returned to Building X-1000 to review records.

### **Records Review**

A record review was conducted. The inspection team requested to review hazardous waste manifests, land disposal restriction forms, mixed-waste shipment documentation, universal waste and used oil shipping records, personnel training information, weekly inspection logs, waste profiles for hazardous waste in storage, and the latest version of the contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection, two years of personnel training records, waste profiles, less than 90-day hazardous waste accumulation area closure final inspection and close-out letters, and weekly inspection logs. Universal Waste was being shipped to USA Lamp and Ballast Recycling, Cincinnati, Ohio, and the date of the last off-site shipment was 6/7/2011. The inspectors reviewed a Contingency Plan that was last updated on March 21, 2011.

### **Closing Conference**

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. U.S. DOE and FBP would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, and completed inspection checklists. Inspector Francis noted that during the inspection of Building X-326 and Building X-330 several containers of used oil were not labeled "Used Oil", and during the inspection of Building X-330 "Electrical Shop", the inspectors observed uncontainerized used fluorescent lamps and three cardboard boxes of used fluorescent lamps that were not labeled. In addition, Inspector Francis mentioned that outside of Building X-344B, the inspectors observed several containers adjacent to a universal waste accumulation area.

### **Attachments**

Inspection Checklists.

**STATE PART B HAZARDOUS WASTE PERMIT  
INSPECTION CHECKLIST**

**DIVISION OF HAZARDOUS WASTE MANAGEMENT  
OHIO EPA  
June 2011**

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**Table of Contents**  
**Portsmouth Gaseous Diffusion Plant**  
**04-66-0680**

RCRA Inspection Checklist.....	
General Conditions of Permit.....	2
General Permit Compliance and Activities .....	2
Permit Modification, Revision, Revocation.....	5
Site Entry - Availability of Records.....	7
Recordkeeping Requirements .....	7
Confidentiality .....	7
Operating Record .....	7
Annual Report Requirement.....	9
Sampling/monitoring Recordkeeping Requirements .....	9
Waste Minimization Requirements.....	10
Off-site Shipments/manifest Requirements .....	11
Manifest Requirements/wastes Received On-site .....	11
Waste Analysis/waste Analysis Plan .....	11
General Requirements.....	12
Waste Analysis Quality Assurance Requirements .....	12
General Inspection Requirements .....	14
Security Provisions/facility Operation.....	15
Personnel Training.....	16
Required Equipment .....	16
Contingency Plan Requirements .....	17
Emergency Procedures .....	17
Emergency Authorities.....	18
Emergency Coordinator.....	18
Amendment of Plan .....	18
Implementation of Plan.....	19
Contingency Plan Requirements .....	20
Closure Plan/amendment .....	20
Closure Activities .....	20
Requirements for Ignitable, Reactive or Incompatible Wastes.....	22
Storage of Hazardous Wastes in Containers.....	24
Condition of Containers .....	25
Inspections .....	25
Containment System .....	26
Required Aisle Space .....	27
Closure and Post-closure .....	27
Container Storage of Residual Waste .....	27
Land Disposal Restriction Requirements.....	28
Prohibition Against Dilution.....	28
Generator Requirements .....	28
Notification/certification.....	29
Storage of Land Disposal Restricted Wastes.....	31

## **PROCESS DESCRIPTION**

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. However, in 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). USDOE retained ownership of the ongoing site environmental restoration program as well as two permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and are leased by USEC. These include decontamination of equipment and uranium recovery (X-705 Bldg.); chemical cleaning of equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); photo and printing lab (X-100); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in DOE owned and permitted storage facilities. Waste generated by DOE from the environmental restoration is also stored in these facilities. USEC ceased the enrichment process in May 2001.

## **WASTE MANAGEMENT, GENERATION AND AMOUNT**

Uranium contaminated hazardous wastes (mixed waste) which were/are generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE sends some waste off-site (to USDOE Oakridge) for treatment prior to final disposal. Treatment residuals are returned to DOE for storage in the interim prior to their final disposal.

### **Hazardous**

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

## **GENERAL CONDITIONS OF PERMIT**

### **GENERAL PERMIT COMPLIANCE AND ACTIVITIES**

1. Has the expiration date of the permit passed? If so: Yes\_\_\_No X N/A \_\_\_ RMK#\_\_\_
- a. Is the permittee continuing any activity regulated by the permit after the expiration date of the permit? Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_
- b. Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? (Or upon a later date if the permittee can demonstrate good cause for late submittal.) [Condition A.6.(a)] Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_
- NOTE:** *The permittee may continue to operate in accordance with the terms and conditions of the expired permit until a renewal permit is issued or denied if:*
- A. The permittee has submitted a timely and complete application for a renewal permit under OAC rule 3745-50-40; and
- B. Through no fault of the permittee, a new permit has not been issued pursuant to OAC rule 3745-50-40 on or before the expiration date of the permit. [Condition A.6.(b)]
2. Has the permittee submitted the annual permit fee, payable to Treasurer, State of Ohio, to Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? [Condition A.26] Yes X No\_\_\_ N/A \_\_\_ RMK#\_\_\_
3. Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Condition A.1.(b) and A.5] Yes\_\_\_No X N/A \_\_\_ RMK#\_\_\_
4. Have any provisions of the permit been identified as invalid? [Condition A.4.] Yes\_\_\_No X N/A \_\_\_ RMK#\_\_\_
5. Has the facility identified any instances of noncompliance with the permit, RC Chapter 3734. or the rules adopted thereunder, which may endanger human health or the environment? If so: Yes\_\_\_No X N/A \_\_\_ RMK#\_\_\_

- c. Steps taken or planned to minimize the impact on human health and the environment and to reduce and prevent recurrence of the noncompliance?

Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_

**Note:** The permittee need not comply with the five day written report requirement if the director, upon good cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee becomes aware of the circumstances. [Condition A.21.(c)]

7. Has the permittee expeditiously taken all steps necessary to minimize or correct any adverse impact on the environment or public health resulting from noncompliance with the permit? [Condition A.8] Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_

8. Has the permittee identified any other instances of noncompliance not provided for in Question 5? Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_

- a. If so, did the permittee report to the director within a month of the time at which the permittee is aware of such noncompliance? [Condition A.22.] Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_

- b. Do the reports provided contain the information set forth in Condition A.20? Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_

9. Has the permittee planned any physical alterations or additions to the permitted facility? Yes\_\_\_No X N/A \_\_\_ RMK#\_\_\_

- a. If so, has the facility provided Ohio EPA with notice of such changes? [Condition A.15] Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_

**Note:** Such notification does not waive the permittee's duty to comply with the permit pursuant to Condition A.5.

#### **REMARKS**

#### **PERMIT MODIFICATION, REVISION, REVOCATION**

a. Has the permittee promptly submitted such facts or corrected information to the appropriate entity?  
[Condition A.24.]

Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_

7. Is the permittee maintaining records of all data used to complete the approved application and any amendments, supplements, revisions or modifications to the application?  
[Condition A.14.(c)]

Yes X No\_\_\_ N/A \_\_\_ RMK#\_\_\_

8. Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14.(c)]

Yes X No\_\_\_ N/A \_\_\_ RMK#\_\_\_

**REMARKS**



- a. A description and the quantity of each hazardous waste received? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Method(s) and date(s) of treatment, storage or disposal at the facility? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. The location of each hazardous waste within the facility and the quantity at each location? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Is the permittee maintaining, until closure is complete and certified, the following documents and amendments, revisions and modifications to these documents as part of its operating record: [Condition A.28.]
- a. Waste analysis plan in accordance with OAC rule 3745-54-13 and the conditions of the permit? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Contingency plan in accordance with OAC rule 3745-54-53 and the conditions of the permit? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Closure plan in accordance with OAC rule 3745-55-12 and the conditions of the permit? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Personnel training plan and records required by OAC rule 3745-54-16 and the conditions of the permit? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- e. Inspection schedules developed in accordance with OAC rules 3745-54-15 and 3745-55-74 and the conditions of the permit? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Have any of the documents identified in Question #3 been revised as required by the permit? If so, Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Has the permittee submitted the revisions to Ohio EPA? [Condition A.28.(b)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Has the permittee received approval in accordance with Ohio hazardous waste rules to make such changes? [Condition A.28.(b)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
5. Is the permittee maintaining copies of all inspection logs at the facility for a period of at least three years from the date of inspection? [Condition A.28.(c)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## **WASTE MINIMIZATION REQUIREMENTS**

10. Has the permittee submitted a Waste Minimization Report to Ohio EPA meeting the requirements of Condition A.29. of the permit within 180 days of permit journalization?

Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

a. Following the first submittal as identified above in Question #10, has the permittee submitted biennial updates to this report as required by Condition A.29.(c)?

Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## **REMARKS**

## GENERAL REQUIREMENTS

1. Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information which is necessary to properly treat, store or dispose of the waste in accordance with OAC Chapters 3745-54 to 3745-57 and Condition B.3 of the permit (Section C of the approved permit application)? [OAC 3745-54-13(A)(1)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Since the last inspection, were any wastes generated by the facility which were unable to be characterized through process knowledge? If so, Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Were the waste analysis procedures described in Section C of the approved permit application followed? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Is the permittee following the procedures described in the approved waste analysis plan (Section C of approved permit application) and the requirements of OAC rule 3745-54-13? [Condition B.3.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Is the permittee maintaining waste analysis data in the facility's operating record as required by OAC rule 3745-54-73 and Condition B.22. of the permit? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## WASTE ANALYSIS QUALITY ASSURANCE REQUIREMENTS

5. Is the permittee verifying the analysis of each waste stream annually as part of its quality assurance program in accordance with SW-846? [Condition B.3.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 
6. In accordance with Condition B.3. of the permit, does the permittee's quality assurance plan ensure that the permittee is, at a minimum:
- a. Maintaining property functional instruments? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Using approved sampling/analytical methods? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## **GENERAL INSPECTION REQUIREMENTS**

1. Is the permittee following the inspection procedures and schedules described in Section F of the approved permit application and the requirements of OAC rule 3745-54-15? [Condition B.5.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Does the permittee inspect the facility with such regularity as to identify problems resulting from deterioration, malfunctions, operator errors or discharges which may lead to a release of hazardous waste to the environment or a threat to human health? [OAC 3745-54-15(A)(1)(2)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Is the permittee following the approved inspection schedule for inspecting: monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15?
- a. Is the schedule kept at the facility? [OAC 3745-54-15(B)(2)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Does the schedule identify the types of problems which are to be looked for during the inspection? [OAC 3745-54-15(B)(3)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Does the schedule include inspection of areas subject to spills daily when in use and according to other applicable regulations when not in use? [OAC 3745-54-15(B)(4)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Does the permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
5. Is the permittee maintaining records of inspections for a minimum of three years? [Condition B.5.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
6. In accordance with OAC rule 3745-54-15(D) and Condition B.5. of the permit, do inspection records contain the following information:
- a. Date and time of inspection? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## **PERSONNEL TRAINING**

1. Is the facility conducting personnel training in accordance with Section H of the approved permit application and the following requirements of OAC rule 3745-54-16: [Condition B.6.]
- a. The facility provides personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [OAC 3745-54-16(A)(B)(C)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. The facility provides personnel training to new employees within six months after their date of employment as required by OAC 3745-54-16(B)? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. The facility provides an annual refresher training course as required by OAC rule 3745-54-16(B)? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and of the approved application, including: written job titles, job descriptions and documented employee training records? [Condition B.6.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

## **REQUIRED EQUIPMENT**

1. Is the permittee, at a minimum, maintaining the equipment set forth in the approved permit application (Section G) at the facility? [Condition B.9.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Is the permittee inspecting, testing, and maintaining the equipment specified in Question #1 to assure its proper operation as specified in OAC rule 3745-54-33, the inspection plans and Section G of the approved permit application? [Condition B.10.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Whenever hazardous waste is being managed at the facility, has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by OAC rule 3745-54-34 and Section G of the approved permit application? [Condition B.11.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### EMERGENCY AUTHORITIES

3. Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so, Yes\_\_\_No X N/A \_\_\_RMK#\_\_\_
- a. Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13.(b)] Yes\_\_\_No\_\_\_ N/A X RMK#\_\_\_
4. Has the permittee, in accordance with OAC rule 3745-54-53 submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.18.] Yes X No\_\_\_ N/A \_\_\_RMK#\_\_\_
5. Has the permittee notified the agencies in Question #4, in writing, within ten days of the effective date of any amendments or revisions to the Plan? [Condition B.18.(b)] Yes X No\_\_\_ N/A \_\_\_RMK#\_\_\_
6. Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Emergency and Remedial Response in accordance with OAC rule 3745-54-53? [Condition B.18.(c)] Yes X No\_\_\_ N/A \_\_\_RMK#\_\_\_

### EMERGENCY COORDINATOR

7. Is the permittee in compliance with the requirements of OAC rule 3745-54-55 with regard to the emergency coordinator? [Condition B.19.] Yes X No\_\_\_ N/A \_\_\_RMK#\_\_\_

### AMENDMENT OF PLAN

8. Is the permittee reviewing the approved contingency plan regularly and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17.] Yes X No\_\_\_ N/A \_\_\_RMK#\_\_\_

**Note:** Also see Question #4 of RECORDKEEPING REQUIREMENTS to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.

## **CONTINGENCY PLAN REQUIREMENTS**

### **CLOSURE PLAN/AMENDMENT**

1. Is the permittee maintaining at the facility, the approved closure plan which contains the elements set forth in OAC rule 3745-55-12? [Condition B.29.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Has the permittee amended the closure plan? If so, Yes \_\_\_ No X N/A \_\_\_ RMK# \_\_\_
- a. Has the plan been amended in accordance with OAC rule 3745-55-12(C)? [Condition B.28.] Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_

**NOTE:** Also see **RECORDKEEPING REQUIREMENTS** (Question #4) in order to verify that any changes to the closure plan were submitted in accordance with OAC rule 3745-50-51.

### **CLOSURE ACTIVITIES**

3. Has the permittee closed the facility? If so, Yes \_\_\_ No X N/A \_\_\_ RMK# \_\_\_
- a. Was closure conducted in accordance with the closure performance standard of OAC rule 3745-55-11? [Condition B.26.] Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_
- b. Did the permittee carry-out the approved closure plan as set forth in the permit application and terms and conditions of the permit? [Condition B.26.] Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_
- c. After receiving the final volume of hazardous waste, did the permittee remove from the facility all hazardous waste and mixed waste and complete closure activities in accordance with the schedule specified in the approved closure plan and as required by OAC rule 3745-55-13? [Condition B.31.] Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_
- d. Has the permittee decontaminated and/or disposed of all facility equipment, structures and soils as required by OAC rule 3745-55-14 and the approved closure plan? [Condition B.32.] Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_

**REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES**

1. Is the permittee following the procedures as specified in OAC rules 3745-54-17, 3745-55-77 and Section F of the approved application when managing ignitable, reactive and/or incompatible wastes? [Conditions B.7.(a) and C.10. and C.11.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Does the permittee **not** store incompatible waste **except** in accordance with OAC rules 3745-54-17(B) and 3745-55-77, and the terms and conditions of this permit? [Condition C.11.(a)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
3. Does the permittee take precautions to prevent placing hazardous waste or mixed waste in an unwashed container that previously held an incompatible waste or material? [Condition C.11.(b)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Does the permittee ensure that all containers of incompatible wastes are physically separated from other incompatible wastes or materials by a wall, berm, dike, or other device in accordance with OAC rule 3745-55-77 and the Appendix to OAC rule 3745-55-99? [Condition C.11.(c)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. Are all containers of aqueous hazardous acids (ph  $\leq$  2) and caustics ph  $\geq$  12.5) sorted on different pallets and physically separated in different rooms? [Condition C.11.(c)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. Are aqueous acids and caustics in poly bottles, and other containers requiring nuclear criticality safety spacing physically separated in the same room by a dike? [Condition C.11.(c)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. Are containers of cyanides and sodium metals being stored in rooms physically separate from other incompatible wastes or other incompatible materials? [Condition C.11.(c)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_



### **STORAGE OF HAZARDOUS WASTES IN CONTAINERS**

**NOTE:** The requirements of permit Condition C do not apply to the permittee's activities as a generator accumulating hazardous waste for < 90 days per OAC rule 3745-52-34(A). Please complete the applicable sections of the Generator Requirements checklist to document compliance with activities associated with < 90-day accumulation of wastes.

1. Is the permittee storing in containers, only those wastes as specified in Section A of the Part B permit application? [Condition C.1.(a), C.2.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Does the permittee limit the total quantity of containerized waste in the container storage area to 133,000 gallons at any given time in the permitted container areas, located in building X-326? [Condition C.1.(a)] 2,418 Drums - Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**NOTE:** For the purposes of compliance with the capacity limitation of the permit, each container will be considered to be storing an amount of hazardous waste equal to its capacity. For example, a 55-gallon drum will be considered to be holding 55 gallons of waste, regardless of the actual quantity stored in the drum. [Condition C.1.(b)]

3. When accumulating waste within the permitted X-326 container storage area, does the permittee ensure that the total amount of waste (both > 90 days and < 90 days) does not exceed the maximum container storage inventory established under Condition C.1.? [Condition C.1.(c)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
4. Are hazardous wastes subject to regulation by the permit stored only at the designated container storage area described in the approved permit application? (See Section D of the permit application) [Condition C.1.(a)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- 
5. Is each container stored clearly marked to identify its contents and the date each period of accumulation/storage begins? (See Section D of the permit application) [Condition C.3.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
6. Does the permittee store hazardous waste in the types of containers described in Section D of the approved permit application? [Condition C.1.(a)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### **CONDITION OF CONTAINERS**

a. Does the permittee note the results of these inspections in the inspection log along with any remedial action taken? [Condition C.8.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. On days when containerized waste are added or removed to and/or from any of the permitted areas for storage, does the permittee conduct inspections as described in Section F of the approved Part B permit application and maintain the inspection results in the facility operating record? [Condition C.8.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

### **CONTAINMENT SYSTEM**

15. Does the permittee maintain the containment system as described in Section D of the approved Part B permit application, including: [Condition C.6.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

a. Sufficient design to contain 10% of the total volume of the containers or the volume of the largest container, whichever is greater? [Condition C.6.(b)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

b. A system which is free of gaps and sufficiently impervious to contain leaks and spills? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

c. Equipped with a coating which is compatible with each waste stored in the area? Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

d. *For those wastes which are deemed incompatible with liner material:* Has the permittee installed a separate secondary containment structure within the existing structure which is equipped with a compatible liner? Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_

16. Has the permittee had a spill or leak of wastes or an accumulation of precipitation in the containment system? If so, Yes \_\_\_ No X N/A \_\_\_ RMK# \_\_\_

a. Are spilled or leaked wastes and accumulated precipitation removed from the sump or collection area in a timely manner? [Condition C.6.(c)] Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_

b. Does removal of spilled/leaked wastes and accumulated precipitation occur within 24 hours from the time the spill or leak waste is discovered? [Condition C.6.(c)] Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_

**LAND DISPOSAL RESTRICTION REQUIREMENTS**  
**PROHIBITION AGAINST DILUTION**

1. Has the permittee updated the annual Federal Facility Compliance Act Schedule? [OAC rule 3745-270-50; Condition B.36.] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
2. Does the entity dilute a restricted waste or a treatment residue from a restricted waste: [OAC rule 3745-270-40 through 49; Condition B.36.(c)] Yes \_\_\_ No X N/A \_\_\_ RMK# \_\_\_
- a. As a substitute for adequate treatment to achieve compliance with LDR treatment standards? Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_
- b. To circumvent the effective date of a prohibition (e.g., to dilute a non-wastewater waste to a wastewater to avoid complying with the non-wastewater treatment standard)? Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_
- c. To otherwise avoid a prohibition in OAC rule 3745-270-30 through -39? Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_
- d. To otherwise avoid a prohibition imposed by Section 3004(d) of RCRA? Yes \_\_\_ No \_\_\_ N/A X RMK# \_\_\_

**NOTE:** *If the answer to any of Questions 2(a) through 2(d) above is yes, the entity is impermissibly diluting a restricted waste and is in violation of OAC rule 3745-270-03 [Condition B.36.]. Dilution of wastes is permissible under some conditions. See OAC rule 3745-270-03(B).*

**GENERATOR REQUIREMENTS**

3. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- a. ***For determinations based solely on knowledge of the waste:*** Is supporting data used to make this determination being retained on-site? [OAC rule 3745-270-07; Condition B.36.(e)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- b. Appropriate treatment standard for the waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- c. The manifest number associated with the first shipment of waste? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- d. Waste analysis data, where available? [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- e. Applicable wastewater/non-wastewater category [OAC rule 3745-270-07(A)(2); Condition B.36.(j)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- f. For hazardous debris, list the contaminants subject to treatment, as described in paragraph (B) of OAC rule 3745-270-45; and an indication that these contaminants are being treated to comply with OAC rule 3745-270-45. Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- g. For contaminated soil list the constituents subject to treatment as described in paragraph (D) of OAC rule 3745-270-49, and the following statement: This contaminated soil [does/does not] contain listed hazardous waste and [does/does not] exhibit a characteristic of hazardous waste and [is subject to/complies with] the soil treatment standards as provided in paragraph (C) of OAC rule 3745-270-49 or the universal treatment standards. Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

8. **For wastes that meet treatment standards:** Does the generator submit a one-time written notice and certification to the treatment, storage or disposal facility receiving the wastes stating wastes being received meet applicable treatment standards? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

If so, does the notice/certification including the following:

- a. EPA hazardous waste identification number? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_
- b. The corresponding treatment standards and applicable prohibitions for the waste? [OAC rule 3745-270-07(A)(3); Condition B.36.(j)] Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

- b. The date which accumulation began?

**NOTE:** A TSD facility may store LDR wastes on-site for the purpose of accumulating a sufficient amount of waste for proper recovery, treatment or disposal. [OAC rule 3745-270-50(B)]. During the first of storage, the burden of proof is on Ohio EPA to demonstrate that such storage is not necessary by the facility. Following one year, the burden of proof shifts to the storage facility to demonstrate that such storage of LDR wastes is necessary to facilitate proper recovery, treatment or disposal.

11. Are LDR wastes being stored at the facility for greater than one year? If so,

- a. Has the owner/operator demonstrated that such storage is being conducted solely for the purpose of accumulating sufficient quantities of wastes necessary to facilitate proper recovery, treatment or disposal? [OAC rule 3745-270-50(B); Condition B.36(m)]

Yes X No \_\_\_ N/A \_\_\_ RMK# \_\_\_

**LARGE QUANTITY GENERATOR REQUIREMENTS**  
**COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.  
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.  
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.  
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

**GENERAL REQUIREMENTS**

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to <b>other</b> than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste <b>on-site without a permit</b> or at another facility <b>other</b> than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

[Facility Name/Inspection Date]  
 [ID number]  
 LQG/August 2009  
 Page 1 of 6

b.	Job descriptions? [3745-65-16D(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Completed training or job experience required? [3745-65-16D(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**NOTE:** The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

#### CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**NOTE:** If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**NOTE:** The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

#### EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG/August 2009

Page 3 of 6

a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**NOTE:** The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

#### USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:	
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**NOTE:** Record location on process summary sheets, photograph the area, and record on facility map.

48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**NOTE:** OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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**NOTE:** Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

#### PRE-TRANSPORT REQUIREMENTS

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG/August 2009

Page 5 of 6



**USED OIL INSPECTION CHECKLIST  
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

**NOTE:** A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

**PROHIBITIONS**

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**NOTE:** For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**NOTE:** Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

**GENERATOR STANDARDS**

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**NOTE:** Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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**NOTE:** If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)] <i>314 X-24 + X-220</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

**ON-SITE BURNING IN SPACE HEATER**

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

[Facility Name/Inspection Date]

[ID Number]

Used Oil Checklist for Generators/June 2008

Page 1 of 2

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS		
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more		
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less		
<b>PROHIBITIONS</b>		
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<b>WASTE MANAGEMENT AND LABELING/MARKING</b>		
<b>UNIVERSAL WASTE BATTERIES</b>		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>UNIVERSAL WASTE LAMPS</b>		
8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>816X-230</i>
9.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>816X-230</i>
<b>NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</b>		
10.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <i>816X-230</i>

EXPORTS			
23.	Is waste being sent to a foreign destination? If so:		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

## Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

<b>CC-1</b>	<b>265.1080</b>	Do any of the following exclusions apply? If yes, please circle.	<b>YES</b>	<b>NO</b>
<p><b>Applicability:</b> The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):</p> <ol style="list-style-type: none"> <li>1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.</li> <li>2. The container capacity is less than .1 cubic meter (26 gallons)</li> <li>3. A unit (e.g. tank) has stopped adding waste and is undergoing closure</li> <li>4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program</li> <li><input checked="" type="radio"/> 5. The unit is used solely to manage radioactive mixed waste</li> <li>6. The unit is regulated by and operates in accordance with Clean Air Act regulations</li> </ol> <p><b>*Note:</b> 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt</p>				
<b>CC-2</b>	<b>265.1083</b>	Do any of the following exemptions apply? If yes, please circle	<b>YES</b>	<b>NO</b>
<p><b>General Standards:</b> The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):</p> <ol style="list-style-type: none"> <li>1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)</li> <li>2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.</li> <li>3. The unit is a tank used for certain biological treatment</li> <li>4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)</li> <li>5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements</li> </ol>				
<b>CC-3</b>	<b>265.1084</b>	<b>Waste Determination:</b>	Determination Not Needed	Determination Needed
<p>Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is <u>not</u> needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.</p>				

#	NA=Not Applicable, NI=Not Inspected, OK=In Compliance, DR=Deficiency	NA	NI	OK	DR
<b>CONTAINER MANAGEMENT 265.1087</b>					
Level 1		Level 2		Level 3	
Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service		Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)		Larger than 26.4 gallons and treat H.W. by a stabilization process	
<b>CC-4</b>	<b>265.1087</b>	<b>Controls</b>			
One of the following: -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container 265.1087(c)		One of the following: -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) 265.1087(d)		-Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: 1.container must be vented directly to a control device; or 2.container is vented inside an enclosure which is exhausted through a close vent to a control device -Conservation vents are not allowed 265.1087(b)(2)	